

1 ROGER GRANDGENETT, ESQ.
2 Nevada Bar No. 6323
3 HILARY MUCKLEROY, ESQ.
4 Nevada Bar No. 9632
5 LITTLER MENDELSON, P.C.
6 3960 Howard Hughes Parkway
7 Suite 300
8 Las Vegas, Nevada 89169
9 Telephone: 702.862.7738
10 Facsimile: 702.862.8881
11 RGrandgenett@littler.com
12 HMuckleroy@littler.com

13 Attorneys for Defendant
14 AIDS HEALTHCARE FOUNDATION

15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RENE GARCIA, an individual,

Plaintiff,

v.

AIDS HEALTHCARE FOUNDATION, a
foreign non-profit corporation; DOES I-X;
and ROE CORPORATIONS 1-X,

Defendant.

Case No. 2:19-cv-00404-JCM-NJK

**STIPULATION AND ORDER TO EXTEND
TIME TO FILE A RESPONSIVE
PLEADING**

[FIRST REQUEST]

Plaintiff RENE GARCIA (“Plaintiff”) and Defendant AIDS HEALTHCARE FOUNDATION (“Defendant”), by and through their respective undersigned counsel, hereby request that the Court extend the deadline for Defendant to file its first responsive pleading, which is currently set for April 15, 2019, for a period of fifteen (15) days, until April 30, 2019. This is the first stipulation for an extension of time to file the first responsive pleading. Any and all defenses are preserved and retained and that no defense is waived by this request.

This request is made in good faith and not to cause unnecessary delay as Defendant had needed to obtain local counsel in this matter. As a result, the extension requests is for a limited and reasonable amount of time.

1 IT IS SO STIPULATED.
2
3

4 Dated: April 12, 2019
5
6

7 */s/ Jenny L. Foley* _____
8 JENNY L. FOLEY, ESQ.
9 Nevada Bar No. 9017
10 HKM EMPLOYMENT ATTORNEYS LLP
11 Attorneys for Plaintiff
12 RENE GARCIA
13

14 Dated: April 12, 2019
15
16

17 */s/ Hilary Muckleroy* _____
18 HILARY MUCKLEROY, ESQ.
19 Nevada Bar No. 9632
20 LITTLER MENDELSON, P.C.
21 Attorneys for Defendant
22 AIDS HEALTHCARE FOUNDATION
23
24

25 **ORDER**
26
27

28 **IT IS SO ORDERED.**
29
30

31 DATED: April 15, 2019
32
33

34 
35 _____
36 UNITED STATES MAGISTRATE JUDGE
37
38